



Cumberland Valley Electric

A Touchstone Energy Cooperative 

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COMMISSION

August 19, 2014

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

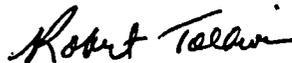
Re: PSC Case No. 2014-00051

Dear Mr. Derouen:

Enclosed are the original and seven copies of the response of Cumberland Valley Electric to Commission Staff's Third Request For Information in Case No. 2014-00051. Each response includes the name of the witness. A signed certification of the person supervising the preparation is included.

If you have any questions about this filing, please feel free to contact me.

Sincerely,



Robert Tolliver  
Office Manager

Enclosures

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CUMBERLAND VALLEY ELECTRIC  
CASE NO. 2014-00051  
RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Item 6

This question is addressed to all member cooperatives. Refer to each member cooperative's July 31, 2013 monthly pass-through filing.

- a. Provide the numerator used in the calculation of the respective member cooperative's pass-through mechanism factor, along with the expense month with which the numerator is associated.

Response:

Column 10 on the pass-through filing shows the numerator of \$329,465 at July 2013. The expense month associated with this numerator is July 2013.

- b. Provide the denominator used in the calculation of the respective member cooperative's pass-through mechanism factor, along with the calculations and the months supporting the calculations of the denominator.

Response:

Column 14 on the pass-through filing shows the denominator of \$3,457,634 at June 2013. The months supporting the calculation of the denominator would be 12 months ending June 2013 then dividing by 12 to get the denominator.

- c. Provide the month's revenue (amount and month of the year) each member cooperative's pass-through mechanism factor for July 2013 is applied to in arriving at the monthly environmental surcharge revenues recovered.

Response:

The month's revenue is \$2,896,035 for the month of September 2013. The July 2013 pass-through mechanism factor was 9.53%.

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
CASE NO. 2014-00051  
RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Item 7

This question is addressed to all member cooperatives. For the month of July 2005, provide the following:

- a. Identify the month in which the member cooperative's revenue requirement was used, along with the months in which the member cooperative's 12-months-ended average retail revenue was used in calculating the pass-through mechanism factor.

Response:

The month in which the first revenue requirement was used in calculating the pass-through mechanism was June 2005. The months in which the 12 months ended average retail revenue was used in calculating the first pass-through mechanism was June 2004 thru May 2005.

- b. Identify the member cooperative's month revenues (amount and month of the year) the pass-through mechanism factor was applied to arrive at the member cooperative's monthly environmental surcharge revenues.

Response:

The very first factor was applied to revenues in the amount of \$3,065,696 for the month of August 2005. Cumberland Valley did not collect any environmental surcharge revenue in the month of July 2005.

- c. Identify the member cooperative's month revenues (amount and month of the year) used in calculating any over/under recovery, along with the month the over/under recovery is reflected, in the member cooperative's response to the Information Request of Commission Staff following the June 18, 2014 Informal Conference ("Staff's IC Information Request"), item 2.

Response:

For the month of July 2005, Cumberland Valleys' revenues in the amount of \$0 and the surcharge from July 2005 EKPC power bill of \$125,262 results in an under-recovery for that period of \$125,262. This under recovery would be reflected in case 2006-00131 as referenced in Cumberland Valley's response to Staff's IC information request, Item 2 and recovered in the months of January 2007 thru June 2007.

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
CASE NO. 2014-00051  
RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Item 8

This question is addressed to all member cooperatives. For the month of December 2013, provide the following:

- a. Identify the month in which the member cooperative's revenue requirement was used, along with the months in which the member cooperative's 12-months-ended average retail revenue was used, in calculating the pass-through mechanism factor.

Response:

October 2013 was used for the revenue requirement. The months of October 2012 thru September 2013 was used for the 12 months ended average retail revenue. Keep in mind the factor that is calculated for October 2013 is applied to the December 2013 billing revenue.

- b. Provide the member cooperative's month revenues the pass-through mechanism factor was applied to arrive at the member cooperative's monthly environmental surcharge revenues.

Response:

The revenues were \$4,087,434.

- c. Provide the member cooperative's month revenue and the member cooperative's month expense used in calculating any over/under recovery, along with the month the over/under recovery is reflected in the member cooperative's response to Staff's IC Information Request, item 2.

Response:

For the month of December 2013, Cumberland Valleys' December 2013 revenues in the amount of \$435,317 and the surcharge from the December 2013 power bill of \$544,950 results in an under recovery for that period of \$109,633. This under recovery would be reflected in case 2014-00051 as referenced in Cumberland Valley's response to Staff's IC information request, Item 2, and would be recovered in some future months.

- d. If there was a change in the calculation between Item No. 8 and Item No. 9, fully explain the reason for the change and provide any Commission supporting authorization for the change.

Response:

Cumberland Valley has had no change in the method of calculation.

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
CASE NO. 2014-00051  
RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Item 9

This question is addressed to all member cooperatives. In a month when there is an amortization of an over- or under-recovery amount applied in the calculation of the pass-through mechanism factor, do the member cooperatives agree that the pass-through factor is a net factor, and the net factor is a combination of the pass-through factor that is attributed to the member cooperative's revenue requirement divided by the 12-months-ended average retail revenues and the member cooperative's amortization of any over- or under-recovery amount also divided by the 12-months-ended average retail revenues? If not, explain.

Response:

Cumberland Valley Electric agrees that in a month when there is an amortization of an over- or under-recovery amount applied in the calculation of the pass-through mechanism factor that the pass-through factor is a net factor. However, Cumberland Valley Electric does not agree with the description of the calculation of the pass-through factor as stated in the request. As clearly shown on the monthly "Pass Through Mechanism Report" filed for Cumberland Valley Electric, the monthly revenue requirement shown in column 8 is combined with the amortization of over- or under-recovery shown in column 9. The net amount is shown in column 10. The net amount in column 10 is divided by the 12-months ended average net retail revenues shown in column 14, producing the pass-through factor shown in column 15. While the approach described in the request essentially produces the same result mathematically, separate pass-through factor components are not calculated for the monthly revenue requirement and the amortization of the over- or under-recovery.

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
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RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Item 10

This question is addressed to all member cooperatives.

- a. Does each member cooperative have a monthly Fuel Adjustment Clause ("FAC") that contains a prior month over- or under-recovery mechanism in the calculations?

Response:

Yes.

- b. If the answer to 10.a. above is yes, does each member cooperative remove the prior month over- or under-recovery amount in calculation the current month's over- or under-recovery amount?

Response:

No.

- c. If the answer to 10.b. above is no, explain why it is appropriate to remove any over- or under-recovery amount in the environmental surcharge, but it is not required to remove any over/under recovery in the FAC.

Response:

It should be noted that the environmental surcharge is established by KRS 278.183 while the FAC is established by 807 KAR 5:056 and neither explicitly address how over- and under-recoveries are to be handled.

Under the FAC for the Member Cooperatives, the over- or under-recovery from the second previous month is incorporated into the calculations of the current FAC. The current FAC is applied to retail customer bills rendered two months later. Thus, there is a four month lag from the inception of an over- or under- recovery until it is refunded or collected on the retail customers' bill. Each month the retail customers' bill will include a single month's FAC over- or under-recovery amount. There is no adjustment to remove any previous month's over- or under-recovery amount in calculating the current month's over- or under-recovery.

Under the environmental surcharge, the over- or under-recovery is determined during the periodic six-month and two-year surcharge review cases. Under normal circumstances, the over- or under-recovery determined during a surcharge review case will cover six months of surcharge operation and the amortization period of the over- or under-recovery has been six months. While the amortization results in an equal dollar amount being included in the retail customers' bills during the amortization period,

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
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rather than an amount that reflects month to month changes in sales volumes, it is essentially the same approach as the FAC. Each month during the amortization period will reflect a single month's surcharge over- or under-recovery amount. There have been no adjustments to remove any previous month's over- or under-recovery amount when calculating the current month's over- or under-recovery. However, the processing of Case Nos. 2012-00486 and 2013-00140 were not normal circumstances. Case No. 2012-00486 reviewed the last six months of a two-year review period and two subsequent six-month review periods, for a total of 18 months of surcharge operations. The case was opened on November 16, 2012 and the Commission's final Order was dated August 2, 2013. Although the review period covered 18 months of surcharge operations, the over- and under-recoveries determined for the Member Cooperatives were amortized over six months. The first month of the amortization of the over- and under-recoveries was reflected in the Member Cooperatives' surcharge pass-through factors filed with the Commission on August 20, 2013. Case No. 2013-00140 covered a single six-month review period. This case was opened on May 14, 2013 and the Commission's final Order was dated September 17, 2013. The over- and under-recoveries determined for the Member Cooperatives were amortized over six months. The first month of the amortization of the over- and under-recoveries was reflected in the Member Cooperatives' surcharge pass-through factors filed with the Commission on September 20, 2013. Because of the number of review periods included in the two cases and the overlapping of the amortization periods for these two cases, over- and under-recoveries resulting from 24 months of surcharge operations were amortized over a total of seven months. Thus, the normal situation where six months of surcharge operations are reflected in six months of over- or under- recovery amortization no longer was in force. Without some adjustment to remove the effects of amortizing over- or under-recoveries resulting from 24 months of surcharge operations over seven months, subsequent surcharge review over- and under-recovery calculations will be skewed.

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
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RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION

Item 11

This question is addressed to all member cooperatives.

- a. Provide the schedules which support the amount of both the environmental surcharge revenues and the environmental surcharge expenses removed from their cost-of-service on Schedule S for each of their rate filings which cover the period July 2005 through December 2013.
- b. Provide an analysis comparing the monthly amounts in 11.a. above with the same monthly amounts the member cooperatives provided in their response to Staff's IC Information Request, Item No. 2.
- c. If there is a difference in the monthly revenue and/or expense amounts in the response to 11.b. above, provide a complete explanation of the reason(s) for the difference.

Response:

Cumberland Valley's last cost-of-service study for a rate filing in the period of July 2005 through December 2013 was done in a test year of 2004 prior to the environmental surcharge implementation.

Witness: Robert Tolliver

CUMBERLAND VALLEY ELECTRIC  
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Item 12

This question is addressed to all member cooperatives. For each of the member cooperatives, provide the following:

- a. The cumulative over/under recovery for the 24-month period ending December 31, 2013.

Response :

Cumberland Valley had a cumulative over recovery for the 24 month period of (\$33,476).

- b. If the amount provided in 12.a. above is amortized over a six-month period, provide the bill impact on the average residential customer.

Response:

The dollar impact is (\$.16).

See Exhibit A Pages 1 thru 3

Witness: Robert Tolliver

**CUMBERLAND VALLEY ELECTRIC  
CASE NO. 2014-00051  
RESPONSE TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

**Item 13**

**This question is addressed to all member cooperatives.**

- a. **Provide the billing cycles and billing dates for each cycle in the month of July 2013.**

**Response:**

**Cumberland Valley Electric has only one billing cycle. The billing date for July 2013 was on July 29, 2013.**

- b. **For each billing cycle in July 2013, provide the environmental surcharge factor that was billed to customers.**

**Response:**

**The environmental surcharge factor used in July 2013 was 13.89%.**

**Witness: Robert Tolliver**

Item #12B  
Impact on Average Bill

Response:

**No Recovery**

Average Monthly Residential Usage 1,117  
12 Months Ending November 30, 2013

<u>Energy@</u>	0.08563	\$95.65
Customer Charge		\$5.74
Fuel @	-0.0013372	(\$1.49)
Environmental Surcharge @	4.25%	\$4.25
Local School Tax @	3.00%	<u>\$3.12</u>
TOTAL BILL AMOUNT		\$107.27

**Six-Month Recovery**

Average Monthly Residential Usage 1,117  
12 Months Ending November 30, 2013

<u>Energy@</u>	0.08563	\$95.65
Customer Charge		\$5.74
Fuel @	-0.0013372	(\$1.49)
Environmental Surcharge @	4.09%	\$4.09
Local School Tax @	3.00%	<u>\$3.12</u>
TOTAL BILL AMOUNT		\$107.11

The Dollar Impact (\$0.16)

The billing period of February 2014 was used for calculation

Witness: Robert Tolliver

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives  
 Pass Through Mechanism Report for Cumberland Valley Electric

For the Month Ending February 2014

Surcharge Factor Expense Month	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
	EKPC CESF %	EKPC BESF %	EKPC MESF %	EKPC Monthly Revenues from Sales to Cumberland Valley	On-peak Revenue Adjustment	EKPC Net Monthly Sales to Cumberland Valley	EKPC 12-months Ended Average Monthly Revenue from Sales to Cumberland Valley	Cumberland Valley Revenue Requirement	Amortization of (Over)/Under Recovery	Cumberland Valley Net Revenue Requirement	Cumberland Valley Total Monthly Retail Revenues	On-Peak Retail Revenue Adjustment	Cumberland Valley Net Monthly Retail Revenues	12-months ended Avg. Retail Revenues, Net	Cumberland Valley Pass Through Mechanism Factor
			Col (1) - Col (2)			Col (4) - Col (5)		Col (3) x Col (7)		Col (6) + Col (9)			Col (11) - Col (12)		Col (10) / Col (14)
Mar-12	12.92%	0.00%	12.92%	2,412,544		2,412,544	2,710,882	350,246	-	350,246	2,969,090		2,969,090	3,480,760	9.89%
Apr-12	14.94%	0.00%	14.94%	2,088,654		2,088,654	2,697,313	402,978	-	402,978	2,800,486		2,800,486	3,461,927	11.58%
May-12	16.90%	0.00%	16.90%	2,273,514		2,273,514	2,696,338	455,681	-	455,681	3,041,094		3,041,094	3,485,559	13.16%
Jun-12	15.55%	0.00%	15.55%	2,464,606		2,464,606	2,676,388	416,178	-	416,178	2,781,417		2,781,417	3,455,567	11.94%
Jul-12	14.51%	0.00%	14.51%	2,706,093		2,706,093	2,656,703	385,488	-	385,488	3,575,045		3,575,045	3,456,933	11.16%
Aug-12	14.13%	0.00%	14.13%	2,516,047		2,516,047	2,621,269	370,385	-	370,385	3,598,947		3,598,947	3,416,893	10.71%
Sep-12	16.23%	0.00%	16.23%	2,217,586		2,217,586	2,612,242	423,967	-	423,967	2,760,296		2,760,296	3,391,047	12.41%
Oct-12	17.57%	0.00%	17.57%	2,342,637		2,342,637	2,612,369	458,993	-	458,993	2,893,662		2,893,662	3,396,871	13.54%
Nov-12	18.23%	0.00%	18.23%	2,951,708		2,951,708	2,625,372	478,605	-	478,605	3,724,856		3,724,856	3,413,007	14.09%
Dec-12	14.61%	0.00%	14.61%	3,071,075		3,071,075	2,616,819	382,317	-	382,317	3,595,071		3,595,071	3,368,792	11.20%
Jan-13	13.49%	0.00%	13.49%	3,226,392		3,226,392	2,608,325	351,863	-	351,863	4,642,247		4,642,247	3,391,523	10.44%
Feb-13	12.61%	0.00%	12.61%	2,916,221		2,916,221	2,598,923	327,724	-	327,724	3,893,708		3,893,708	3,356,327	9.66%
Mar-13	14.37%	0.00%	14.37%	3,064,072		3,064,072	2,653,217	381,267	-	381,267	3,770,405		3,770,405	3,423,103	11.36%
Apr-13	14.27%	0.00%	14.27%	2,250,724		2,250,724	2,666,723	380,541	-	380,541	3,085,730		3,085,730	3,446,873	11.12%
May-13	17.97%	0.00%	17.97%	2,239,113		2,239,113	2,663,856	478,695	-	478,695	2,800,325		2,800,325	3,426,809	13.89%
Jun-13	17.09%	0.00%	17.09%	2,432,452		2,432,452	2,661,177	454,795	-	454,795	3,151,321		3,151,321	3,457,634	13.27%
Jul-13	15.77%	0.00%	15.77%	2,434,308		2,434,308	2,638,528	416,096	(86,631)	329,465	3,144,888		3,144,888	3,421,788	9.53%
Aug-13	15.49%	0.00%	15.49%	2,428,129		2,428,129	2,631,201	407,573	(72,539)	335,034	3,137,474		3,137,474	3,383,332	9.79%
Sep-13	14.93%	0.00%	14.93%	2,130,317		2,130,317	2,623,929	391,753	(72,539)	319,214	2,896,035		2,896,035	3,394,643	9.43%
Oct-13	16.69%	0.00%	16.69%	2,065,805		2,065,805	2,600,860	434,083	(72,539)	361,544	2,683,025		2,683,025	3,377,090	10.65%
Nov-13	17.43%	0.00%	17.43%	2,694,276		2,694,276	2,579,407	449,591	(72,539)	377,052	3,151,601		3,151,601	3,329,319	11.16%
Dec-13	14.54%	0.00%	14.54%	3,126,509		3,126,509	2,584,027	375,717	(72,539)	303,178	4,087,434		4,087,434	3,370,349	9.11%
Jan-14	10.92%	0.00%	10.92%	4,015,375		4,015,375	2,649,775	289,355	14,092	303,447	5,132,308		5,132,308	3,411,188	9.00%
Feb-14	5.44%	0.00%	5.44%	3,131,762		3,131,762	2,667,737	145,125	-	145,125	4,369,862		4,369,862	3,450,867	4.25%

Notes:  
 Cumberland Valley Total Monthly Retail Revenues in Column (11) includes demand and energy charges, customer charges, and FAC revenues.  
 Revenues reported in Columns (4), (6), (7), (11), (13), and (14) are net of Green Power Revenues.

Exhibit A  
 Page 2 of 3

East Kentucky Power Cooperative, Inc. - Distribution Cooperatives  
Pass Through Mechanism Report for Cumberland Valley Electric

For the Month Ending February 2014

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
Surcharge Factor Expense Month	EKPC CESF %	EKPC BESF %	EKPC MESF %	EKPC Monthly Revenues from Sales to Cumberland Valley	On-peak Revenue Adjustment	EKPC Net Monthly Sales to Cumberland Valley	EKPC 12-months Ended Average Monthly Revenue from Sales to Cumberland Valley	Cumberland Valley Revenue Requirement	Amortization of (Over)/Under Recovery	Cumberland Valley Net Revenue Requirement	Cumberland Valley Total Monthly Retail Revenues	On-Peak Retail Revenue Adjustment	Cumberland Valley Net Monthly Retail Revenues	12-months ended Avg. Retail Revenues, Net	Cumberland Valley Pass Through Mechanism Factor
			Col (1) - Col (2)			Col (4) - Col (5)		Col (3) + Col (7)		Col (8) + Col (9)			Col (11) - Col (12)		Col (10) / Col (14)
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Oct-13	16.69%	0.00%	16.69%	2,065,805		2,065,805	2,600,860	434,083	(72,539)	361,544	2,683,025		2,683,025	3,377,090	10.65%
Nov-13	17.43%	0.00%	17.43%	2,694,276		2,694,276	2,579,407	449,591	(72,539)	377,052	3,151,601		3,151,601	3,329,319	11.16%
Dec-13	14.54%	0.00%	14.54%	3,126,509		3,126,509	2,584,027	375,717	(72,539)	303,178	4,087,434		4,087,434	3,370,349	9.11%
Jan-14	10.92%	0.00%	10.92%	4,015,375		4,015,375	2,649,775	289,355	14,092	303,447	5,132,308		5,132,308	3,411,188	9.00%
Feb-14	5.44%	0.00%	5.44%	3,131,762		3,131,762	2,667,737	145,125	(5,579)	139,546	4,369,862		4,369,862	3,450,867	4.09%

Notes:  
Cumberland Valley Total Monthly Retail Revenues in Column (11) includes demand and energy charges, customer charges, and FAC revenues.  
Revenues reported in Columns (4), (6), (7), (11), (13), and (14) are net of Green Power Revenues.

Exhibit A  
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